

## REMARKS

Claim 1 is currently pending in the application. Claim 1 stands rejected. By this paper, claim 1 has been amended to highlight the relevant innovations disclosed in the present invention. In addition, claims 2-24 have been added. Thus, claims 1-24 are presented for examination. For the reasons set forth below, these claims are believed to be in condition to allowance.

### **35 U.S.C. § 102(b) Anticipation Rejections**

Claim 1 stands rejected under 35 U.S.C. § 102(b) as being anticipated by Solomon, U.S. Patent No. 3,922,128 (hereinafter “Solomon”). Applicants respectfully traverse this rejection, as hereinafter set forth.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Solomon teaches extruding a coating material to coat a substrate. Applicants respectfully submit, however, that Solomon does not teach all elements of the present invention.

Independent claims 1 and 14 of the present invention disclose pushing a substrate through a substrate coating device. Solomon does not teach a pushing action. Instead, the invention disclosed by Solomon requires that the substrate be pulled through the coating device, where it is wound on a spool (Solomon Fig. 1, number 26). The present invention discloses a device for coating a non-continuous substrate that can be fed through the coating device by pushing the substrate rather than by pulling the substrate. The ability to push a discrete piece of substrate

through the coating device is a prime advantage of the present invention. For example, the present invention discloses applying coatings to sections of crown molding or baseboard, picture frames, metal railings, or 4 foot by 8 foot panels. The disclosure provided in Solomon would not permit extruding a coating onto such discrete pieces of substrate by pushing each through the coating device.

The Examiner has used the term “rigid” in referring to the substrates on which the Solomon invention operates. Solomon, however, never refers to rigid substrates. Instead, the Solomon coating device operates on continuous, flexible “strands.” Solomon does refer to a rigid plastic coating (at col. 1, lines 34-38), but this can only refer to the final state of the coating after the extrusion process is completed. This is obvious from the design of the coating device in Solomon, as well as from terms such as “molten polymer” (col. 1, line 68 to col. 2, line 3) and “viscous plastic” (col. 3, lines 44-48). Solomon further states that the strand—the substrate—never touches the “rigid” surface of the coating device (col. 3, lines 48-52). None of these references in Solomon refer to a rigid substrate, as is claimed in the present invention. Applicants respectfully point out that the “strands” that are disclosed by Solomon are wound on a spool in Fig. 1, item 26. Contrarily, none of the discrete, rigid piece goods that the present invention contemplates could be efficiently coated using the “pull” technique disclosed by Solomon for a flexible strand.

Solomon also does not teach using a die aperture that conforms to the cross sectional shape of the substrate being coated. The Examiner notes that the disclosure in Solomon refers to a coating die aperture that substantially conforms to the cross-section of the substrate. The relevant aperture is shown in Solomon at Fig. 4, item 54. This aperture, however, is not identical to the teaching of the present invention. Independent claim 1 of the present invention states that

the “aperture of a substrate coating device...substantially conform[s] to said cross-sectional profile....” The aperture of the device disclosed by Solomon *does not*, in fact, conform to the cross-section of the substrate. Fig. 2 and Fig. 3 of Solomon clearly show that the aperture through which the substrate passes does not conform to the cross-section of the substrate. Rather, only the *exit aperture* of the Solomon device (Fig. 4, item 54) conforms to the cross-section of the substrate. In contrast, within the present invention, the entire aperture, or the entire path of the substrate through the coating device, conforms substantially to the cross-section of the substrate. This distinction permits the present invention to provide coating on a single side of the substrate, or to provide two or more different coatings in subsequent stages without interfering with one another. None of these advantages attach to the coating device disclosed by Solomon.

In summary, Solomon 1) does not teach the pushing action that is claimed by the present invention; 2) does not refer at any point to coating a rigid substrate, as claimed in the present invention; and 3) does not teach the use of an aperture throughout the coating device that conforms substantially to the cross-sectional shape of the substrate being coating. Applicants therefore respectfully submit that Solomon does not anticipate the present invention.

## **ENTRY OF AMENDMENTS**

The amendments to claims 1-24 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application. Further, the amendments do not raise new issues or require a further search.

## **CONCLUSION**

In view of the foregoing, Applicant respectfully submits that claims 1-24 are in condition for immediate allowance. In the event the Examiner finds any remaining impediment to the prompt allowance of any of these claims which could be clarified in a telephone conference, the Examiner is respectfully urged to initiate the same with the Applicant's undersigned attorney.

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Respectfully submitted,



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